

GORSKI & KNOWLTON PC

CAROL L. KNOWLTON †
ALLEN I. GORSKI †

COUNSELORS AT LAW
311 WHITEHORSE AVENUE
SUITE A
HAMILTON, NEW JERSEY 08610

Telephone:
(609)964-4000
Fax:
(609)585-2553

† NJ AND PA BAR

WRITER'S EMAIL: AGORSKI@GORSKIKNOWLTON.COM

November 25, 2019

Via ECF

Honorable Michael B. Kaplan, U.S.B.J.
United States Bankruptcy Court
402 East State Street
Trenton, New Jersey 08608

Re: Jorge E. Nieves, Jr.
Case No.: 17-12247-MBK
Trustee's Motion to Dismiss; Returnable: December 3, 2019 at 9 a.m.

Dear Judge Kaplan:

Our firm is a general unsecured creditor in the above captioned case. The Debtor's Plan provides for a 100% distribution to creditors from the proceeds of sale of the Debtor's real estate. We oppose the Trustee's Motion to Dismiss and support the Debtor's Modified Plan as the Modified Plan provides for payment in full of unsecured creditors.

Respectfully Submitted,

/s/ Allen I. Gorski

ALLEN I. GORSKI

AIG:jjf

cc: Candyce I. Smith-Sklar, Esquire (via ECF)
Albert Russo, Standing Chapter 13 Trustee (via ECF)